

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DOCKET NO. 05-10412-JLT

CONCETTA NYMAN *
 PLAINTIFF *
 *
 V. *
 *
FEDERAL RESERVE BANK *
OF BOSTON *
 DEFENDANTS *

**PLAINTIFF'S OPPOSITION
TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Now comes the Plaintiff in the above-captioned matter and respectfully requests that this Honorable Court deny Defendant's Motion for Summary Judgment. In support thereof, Plaintiff states that she is entitled to relief and further states that genuine issues of material facts exist. Plaintiff further states as follows, and refers to the Memorandum and Exhibits attached hereto.

1. Plaintiff's Claim is Not Time Barred.

The Plaintiff filed her claim within 60 days from the date of her termination, which is when she knew that the Defendant did not intend to accommodate her.

2. The Defendant Refused to Provide Reasonable Accommodations to the Plaintiff

Plaintiff's managers refused to allow the Plaintiff to work within the restrictions ordered by her doctors and the Defendant's own nurse, and refused to make accommodations.

3. The Plaintiff's Condition Constituted a Disability.

Plaintiff's condition caused her to suffer multiple limitations of major life activities, including work, sleeping, and personal care, and would have been able to continue in her work had the Defendant provided reasonable accommodations. Moreover, the accommodation requested was reasonable and would not have imposed any undue burden on the Defendant.

WHEREFORE, Plaintiff in the above-captioned matter respectfully requests that this Honorable Court deny Defendant's Motion for Summary Judgment

By Plaintiff's Attorney,



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